ARNOLD & PORTER LLP

Kent A. Yalowitz

Kent.Yalowitz@aporter.com +1 212.715.1113 +1 212.715.1399 Fax 399 Park Avenue New York, NY 10022-4690

November 11, 2014

VIA HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Sokolow, et al. v. Palestinian Liberation Organization, et al.

Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I write in anticipation of the November 20 pretrial conference to request that the Court address a few housekeeping matters.

1. Jury Selection.

We respectfully suggest that the Clerk of the Court obtain jury questionnaire responses from a venire of prospective jurors on Monday, January 5, 2015 and provide copies of the responses to the parties as soon thereafter as practicable (preferably later that day) in order to have an efficient start on January 12.

2. Trial Schedule.

Most witnesses are traveling from outside the District (and indeed from outside the United States). In order to help these individuals plan their schedules, we ask that the Court advise the parties of the days on which it will take testimony.

3. Interpreters.

Several witnesses will require interpreters or stand-by interpreters. We have consulted with the defendants, and both sides respectfully ask that the Court order that the costs of mutually agreeable interpreters at trial be split equally between plaintiffs and defendants.

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4. Trial Transcript.

We have consulted with the defendants, and both sides respectfully ask that the Court order that the costs of the transcript be split equally between plaintiffs and defendants.

5. Defendants' Objections to Exhibits.

We have sought to hold a meet and confer with the defendants concerning certain issues that we believe can be resolved well in advance of trial, to avoid wasting the jury's time. We have also requested that the defendants provide explanations concerning how plaintiffs' trial exhibits may be corrected in order to address the defendants' objections concerning the exhibits' 1) completeness, 2) translations and 3) organization and compilation. We have been rebuffed in our efforts, and request that the Court order the defendants to provide the requested information and set a date certain for the meet and confer.

Respectfully,

All ECF Counsel cc: